

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NICHOLAS MARTIN on behalf of himself	)	
and others similarly situated,	)	
	)	
Plaintiff,	)	Case 1:10-cv-3494
	)	
v.	)	Judge Dow
	)	
CCH, INCORPORATED,	)	Magistrate Judge Ashman
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR A PROTECTIVE ORDER**

Defendant CCH, Incorporated requests that this Court enter the attached protective order, and in support states the following:

1. The parties anticipate the need for discovery involving the production and disclosure of documents, data and other materials and information, and the taking of testimony by oral deposition.

2. The information that may be discovered in this litigation contains sensitive information of a non-public nature which should not be generally available to the public, including commercial information, and such information and documents should be subject to the Protective Order. (Exhibit A.)

3. The parties had disagreed about two provisions in the Protective Order, which Magistrate Judge Ashman resolved at hearing on December 7, 2010. The attached Protective Order reflects Magistrate Judge Ashman's ruling.

4. Plaintiff does not oppose this motion.

WHEREFORE, Defendant respectfully requests that this Court enter the Protective Order attached as Exhibit A.

DATED: December 17, 2010

Respectfully submitted,

By: /s/ Susan E. Groh

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2010, I electronically filed the foregoing **UNOPPOSED MOTION FOR A PROTECTIVE ORDER** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Alexander H. Burke  
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/s/ Susan E. Groh